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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

LOS ANGELES PRESS CLUB,
STATUS COUP,

PLAINTIFFS,

v.

CITY OF LOS ANGELES, a municipal
entity, JIM MCDONNELL, LAPD
CHIEF, sued in his official capacity;

DEFENDANTS.

Case No. 2:25-CV-05423-HDV-E

Hon. Hernan D. Vera

DECLARATION OF TINA BERG

Declaration of Tina Berg

I, Tina Berg, hereby declare as follows:

1. I have been a journalist for over 30 years. I have worked for multiple outfits, and I have also freelanced for magazines like Impact, Washington Babylon, Daily Dot, and others.

2. On June 10th, 2025, I was on assignment for Status Coup reporting on protests that were taking place in the downtown LA Civic Center. I had a great position on an embankment where I had a direct line of site that showed both the protestors and the LAPD squaring off. I was probably over 100 ft from the protestors. Unfortunately, not long after arriving getting to that location I was accosted by an LAPD officer. The officer said I needed to go. I had my press pass around my neck. I was with a photojournalist. I was clearly there as a member of the press. When I turned around the officer then yelled at me “lets go!”

3. I did not want to be shot or arrested so I and the photojournalist covering the protest with me complied with the officer’s order. But I still asked why I was being removed. The officer’s answer was that “I gave you a direct order to leave.” I told the officer that 409.7 says that I can film. The officer said “I get that.” He still continued to force me out of the civic center. I told him he was breaking the law and his response was “but you have to go.”

4. I was forced to leave. LAPD has assaulted me multiple times over my 30 years as a journalist. The officer told me to film at the other end of the civic center where I could not see the protest I was filming. I asked him how I could cover a protest I couldn’t see. The answer I got was “let’s walk out.”

5. To do my job I need to be close to the protests. Status Coup focuses on in-field and investigative reporting around the country. In Los Angeles over the last five year Status Coup has reported on labor strikes, the Black Lives Matter protests, the WiSpa Protest, the Dobbs protests, the Free Palestine protests, and now the ICE protests.

1 6. During the course of reporting on these protests LAPD has
2 repeatedly unlawfully interfered with my work as a journalist. In 2020 at Third
3 and Fairfax LAPD shot out the window of my car with rubber bullets and hit me
4 with a baton. During the Echo Park protest an LAPD officer intentionally struck
5 my camera. In the 2022 Dobbs protest two LAPD officers assaulted me and threw
6 me against the pavement when I was filming. Now in 2025 I have been removed
7 from filming a protest I was lawfully allowed to film under 409.7.

8 7. I want to be able to do my job without risking being shot, assaulted,
9 seized, or forcibly removed from a protest. However, especially during the ICE
10 Protests, LAPD has regularly used force or threat of force to interfere with
11 journalists like me.

12 8. Additionally, LAPD's behavior is problematic for me personally
13 because it prevents me from capturing the news. Like a lot of things, journalism is
14 all about timing. You have to be at the right place at the right time. The only way
15 to do that is to stay with the protest and continually film. When LAPD officers
16 detain, remove, or assault me they are also limiting my opportunities to capture
17 meaningful footage.

18 9. LAPD's misconduct has also forced me to move some of my
19 attention and efforts from capturing these events to advocating for my own safety
20 by working with Status Coup to publish documentation of these incidents and
21 also by participating in litigation to enforce the rights of the press. However, the
22 advocacy and documentation of these incidents has apparently not been enough to
23 get LAPD to change its practices.

24 10. I want to be able to cover these events and also be able to stay safe. I
25 shouldn't have to compromise those things to do my job. However LAPD's
26 practice of seizing journalists, shooting at journalists, and unlawfully removing
27 them from the protests they have a right to document is making that impossible
28

1 I declare under penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct. Executed this 25th day of June, at Los
3 Angeles, CA.

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6 Tina-Desiree Berg
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